1 2 3 4 5 6 7 8 9 10	Jeffrey L. Hartman, Esq. Nevada Bar No. 1607 HARTMAN & HARTMAN 510 W. Plumb Lane, Suite B Reno, NV 89509 T: (775) 324-2800 F: (775) 324-1818 notices@bankruptcyreno.com	Michael S. Budwick, Esq. #938777 – Admitted <i>Pro Hac Vice</i> Solomon B. Genet, Esq. #617911 – Admitted <i>Pro Hac Vice</i> Meaghan E. Murphy, Esq. #102770 – Admitted <i>Pro Hac Vice</i> Gil Ben-Ezra, Esq. #118089 – Admitted <i>Pro Hac Vice</i> Alexander E. Brody, Esq. #1025332 – Admitted <i>Pro Hac Vice</i> MELAND BUDWICK, P.A. 3200 Southeast Financial Center 200 South Biscayne Boulevard Miami, Florida 33131 T: (305) 358-6363 F: (305) 358-1221 mbudwick@melandbudwick.com sgenet@melandbudwick.com mmurphy@melandbudwick.com gbenezra@melandbudwick.com abrody@melandbudwick.com		
12	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA			
13	In re	DISTRICT	UF NEVADA Lead Case No.: BK-19-50102-gs	
14			(Chapter 7)	
15	DOUBLE JUMP, INC.		Substantively consolidated with:	
16	Debtor.			
17			19-50130-gs DC Solar Solutions, Inc. 19-50131-gs DC Solar Distribution, Inc.	
18			19-50135-gs DC Solar Freedom, Inc.	
19				
20	CHRISTINA W. LOVATO,			
20	Plaintiff,		Adversary No.: 21-05036-gs	
	, i			
22	V.		MOTION REQUESTING ENTRY OF DEFAULT PURSUANT TO F.R.CIV.P. 55	
23	JCB CONSULTING, INC. fka J& CONSULTING, INC.; and CARI		AND F.R.BANKR.P. 7055	
24	BODEN-CARPOFF aka CAROL	INE SUE	Hearing Date: N/A	
25	BODEN-CARPOFF aka CARRII aka CARRIE BODEN,	E CARPOFF	Hearing Time: N/A	
26				
27	Defendant.			
28				

Christina W. Lovato, in her capacity as the chapter 7 trustee ("*Trustee*" or "*Plaintiff*") for the substantively consolidated bankruptcy estates of DC Solar Solutions, Inc. ("*DCSS*"), DC Solar Distribution, Inc. ("*DCSD*"), DC Solar Freedom, Inc. ("*DCSF*"), and Double Jump, Inc. ("*DJ*," and together with DCSS, DCSD, and DCSF, the "*Debtor Estate*"), and as Plaintiff in this adversary proceeding, hereby requests entry of a default pursuant to F.R.Civ.P. 55 and F.R.Bankr.P. 7055.

- 1. Defendant JCB Consulting, Inc. fka J&C Consulting, Inc. ("*Defendant*") has failed to answer or otherwise plead after service.
- 2. On February 16, 2022, the Clerk of Court entered the Default of Defendant. **Adv. ECF No. 19**.

The Trustee requests entry of Default Judgment as follows:

1. Judgment against JCB Consulting, Inc. fka J&C Consulting, Inc. in the amount of \$16,330,363.80.

This Request is supported by the separately filed Affidavit of Solomon B. Genet.

DATED: February 17, 2022.

## **HARTMAN & HARTMAN**

## /s/ Jeffrey L. Hartman, Esq.

Jeffrey L. Hartman, Esq., Attorney for Trustee Christina W. Lovato

## MELAND BUDWICK, P.A.

## /s/ Alexander E. Brody, Esq.

Michael S. Budwick, Esq., Admitted Pro Hac Vice Solomon B. Genet, Esq., Admitted Pro Hac Vice Meaghan E. Murphy, Esq., Admitted Pro Hac Vice Gil Ben-Ezra, Esq., Admitted Pro Hac Vice Alexander E. Brody, Esq., Admitted Pro Hac Vice Attorneys for Trustee Christina W. Lovato

1	CERTIFICATE OF SERVICE		
2	I certify that on February 17, 2022, I caused to be served the following document(s):		
3	MOTION REQUESTING ENTRY OF DEFAULT PURSUANT TO F.R.CIV.P. 55 AND F.R.BANKR.P. 7055		
4	I caused to be served the above-named document(s) as indicated below:		
5	✓ a. Via ECF to:		
7	ALEXANDER E. BRODY abrody@melandbudwick.com,		
8	ltannenbaum@melandbudwick.com;ltannenbaum@ecf.courtdrive.com;		
9	mrbnefs@yahoo.com		
10	MICHAEL S. BUDWICK <u>mbudwick@melandbudwick.com</u> ,		
11	ltannenbaum@melandbudwick.com;ltannenbaum@ecf.courtdrive.com		
12	SOLOMON B. GENET sgenet@melandbudwick.com,		
13	ltannenbaum@melandbudwick.com; ltannenbaum@ecf.courtdrive.com		
14	JEFFREY L. HARTMAN <u>notices@bankruptcyreno.com</u> ,		
15	abg@bankruptcyreno.com		
16	CHRISTINA W. LOVATO <u>trusteelovato@att.net</u> , <u>NV26@ecfcbis.com</u>		
17			
18	✓ b. Via U.S. Mail, postage prepaid, addressed to:		
19	JCB Consulting, Inc. f/k/a J&C Consulting, Inc. By and through its Registered Agent		
20	Adam I. Miller		
21	18301 Von Karman Avenue, Suite 950 Irvine, CA 92612		
22	I declare under penalty of perjury that the foregoing is true and correct.  DATED: February 17, 2022.		
23			
24	/s/ Alexander E. Brody, Esq.		
25	Alexander E. Brody, Esq.		
26			
27			